

Romano Law PLLC
Daniel S. Braverman, Esq.
One Battery Park Plaza, 7th Floor
New York, New York 10004
(212) 865-9848

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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Dimov Associates LLC d/b/a Dimov Tax and CPA
Services and Dimov Wasserman LLC,

Civil Action No.:

Plaintiffs,
-against-

**NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION**

Marc Wasserman, David Kane and Selective Financial
Solutions,

Defendants.

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TO: Attorneys of Record

COUNSEL:

PLEASE TAKE NOTICE that on July 7, 2025, at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for Dimov Associates LLC d/b/a Dimov Tax and CPA Services and Dimov Wasserman LLC (collectively, “Plaintiffs”) shall move before the Honorable Judge Karen M. Williams at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, for an Order, pursuant to Local Civil Rule 101.1, on the consent of Defendants , granting *pro hac vice* admission of David Fish, Esq. in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs shall rely upon the accompanying declaration of Daniel S. Braverman, Esq. and declaration of David Fish, Esq. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

ROMANO LAW PLLC

By: /s/ Daniel S. Braverman
Daniel S. Braverman, Esq.

One Battery Park Plaza, 7th Floor
New York, New York 10004
Dan@RomanoLaw.Com

Attorneys for Plaintiffs

Dated: May 29, 2025

Romano Law PLLC
Daniel S. Braverman, Esq.
One Battery Park Plaza, 7th Floor
New York, New York 10004
(212) 865-9848

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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Dimov Associates LLC d/b/a Dimov Tax and CPA
Services and Dimov Wasserman LLC

Civil Action No.

Plaintiffs,
-against-

**DECLARATION OF DANIEL S.
BRAVERMAN, ESQ. IN
SUPPORT OF *PRO HAC VICE*
APPLICATION**

Marc Wasserman, David Kane and Selective Financial
Solutions

Defendants.

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I, DANIEL S. BRAVERMAN, ESQ., under penalty of perjury, declares as follows:

1. I am a partner of the law firm Romano Law PLLC, attorneys for Dimov Associates LLC d/b/a Dimov Tax and CPA Services and Dimov Wasserman LLC (together, the “Plaintiffs”), in the above-captioned matter. I am counsel of record for the Plaintiffs in this matter and submit this Declaration in support of the *pro hac vice* admission of David Fish, Esq. of Romano Law PLLC in New York, New York (the “Applicant”), as counsel for Plaintiffs.

2. The Applicant is counsel to Plaintiffs and is familiar with the facts of this action, and he has experience in the field of law relevant to this action.

3. As set forth in his respective accompanying declaration, the Applicant is a member in good standing in all of the jurisdictions in which he has been admitted to practice. There has

never been a disciplinary proceeding against the Applicant in any jurisdiction in which he is, or has been, admitted to practice.

4. As further set forth in his respective accompanying declaration, in the event the Applicant is admitted *pro hac vice* in this action, he will comply with all the requirements of L. Civ. R. 101.1.

5. Upon admission *pro hac vice* of the Applicant, I will continue to participate and serve as counsel of record in this matter and will comply with all of the requirements of L. Civ. R. 101.1.

6. Specifically, as required by L. Civ. R. 101.1(c)(4), I will continue to receive all notices, orders and pleadings, and file all papers, enter appearances for parties, sign stipulations, and sign and receive payments on judgment, decrees, or orders.

7. I will also appear at all proceedings, unless otherwise excused by the Court, and have all pleadings, briefs and other papers signed by myself, or another attorney from my firm authorized to practice before this Court.

8. As required by L. Civ. R. 101.1(d), I will continue to strictly observe the dates fixed for scheduling conferences, motions, pretrial conferences, trials, and any other proceedings.

9. As counsel of record, I will be responsible for the conduct of the case and counsel in this matter.

10. For the foregoing reasons, I respectfully request that the Court enter an Order admitting the Applicant to appear *pro hac vice* before this Court for all further proceedings in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on May 29, 2025

/s/ Daniel S. Braverman

DANIEL S. BRAVERMAN, ESQ.

Romano Law PLLC
Daniel S. Braverman, Esq.
One Battery Park Plaza, 7th Floor
New York, New York 10004
(212) 865-9848

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

----- x
Dimov Associates LLC d/b/a Dimov Tax and CPA
Services and Dimov Wasserman LLC

Civil Action No.

Plaintiffs,
-against-

**DECLARATION OF DAVID
FISH, ESQ. IN SUPPORT OF
MOTION FOR ADMISSION
*PRO HAC VICE***

Marc Wasserman, David Kane and Selective Financial
Solutions

Defendants.

Defendants.
----- x

I, DAVID FISH, ESQ., of full age, hereby declares as follows:

1. I am a Partner at Romano Law PLLC, counsel for Plaintiffs, Dimov Associates LLC d/b/a Dimov Tax and CPA Services and Dimov Wasserman LLC (together, the “Plaintiffs”) in the above matter. I submit this Declaration in support of Plaintiffs’ application for my admission *pro hac vice* in connection with the above-captioned matter.

2. My office address and telephone number are as follows:

Romano Law PLLC
One Battery Park Plaza, 7th Floor
New York, New York 10004
(212) 865-9848

3. I am qualified to practice law *pro hac vice* pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey.

4. I am a member in good standing of the Bar of New York, having been admitted in 1996. The roll of admission is kept at the following location: New York State Unified Court System, Office of Court Administration, Attorney Registration Unit, 25 Beaver Street – Room 840, New York, NY 10004, 212-428-2800.

5. In addition, I am admitted to practice before, and am in good standing with the following federal courts:

- a. The United States District Court for the Southern District of New York (admitted in 1996), for which the roll of admission is maintained at: United States District Court, 500 Pearl Street, New York, New York, 10007, Attention: Attorney Services;
- b. The United States District Court for the Eastern District of New York (admitted in 1996), for which the roll of admission is maintained at: Clerk of the Court, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201;
- c. The United States District Court for the Western District of New York (admitted in 1996), for which the roll of admission is maintained at: Clerk's Office, 2 Niagara Square, Buffalo, NY 14202-3498;
- d. The United States District Court for the Northern District of New York (admitted in 2009), for which the roll of admission is maintained at: Clerk's Office, James T. Foley U.S. Courthouse 445 Broadway, Albany, NY 12207-2926
- e. The U.S. Court of Appeals for the Second Circuit (admitted in 1997), for which the roll of admission is maintained at: Clerk's Office, Supreme Court, State of New

York, Appellate Division, Second Department, 45 Monroe Place Brooklyn, NY 11201; and

- f. The United States Supreme Court (admitted in 2000), for which the roll of admission is maintained at: Clerk, Supreme Court of the U. S, ATTN: Admissions Office, One First Street, NE, Washington, DC 20543.
6. I am in good standing and eligible to practice in each of the above jurisdictions.
7. No disciplinary proceedings are pending against me in any jurisdiction and no disciplinary action has previously been imposed on me in any jurisdiction.
8. I agree to observe the dates fixed for scheduling conferences, motions, briefs, pretrial conferences, trial or other proceedings. I further agree to submit to the jurisdiction of this Court for the purpose of sanctions, discipline, or such other actions as the Court may deem proper, to abide by all requirements of L. Civ. R. 101.1, and to notify the Court immediately of any matter affecting my standing in the Bar of any other court.
9. I further agree to make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) for each year in which I continue to represent a client before this Court in this matter.
10. I also agree to make payment in the amount of \$250.00 to the Clerk of the Court as required by L. Civ. R. 101.1(c)(3).
11. The name and address of the associated counsel of record in this action who is an active member of the State Bar of New Jersey is as follows:

Romano Law PLLC
Daniel S. Braverman, Esq.
One Battery Park Plaza, 7th Floor
New York, New York 10004
(212) 865-9848

I agree to have all pleadings, briefs and other papers filed with the Court signed by Daniel S. Braverman, Esq. or another attorney licensed to practice law in the District of New Jersey from Romano Law PLLC, as the attorney of record for Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 29, 2025

/s/ David Fish
David Fish, Esq.

Romano Law PLLC
Daniel S. Braverman, Esq.
One Battery Park Plaza, 7th Floor
New York, New York 10004
(212) 865-9848

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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Dimov Associates LLC d/b/a Dimov Tax and CPA
Services and Dimov Wasserman LLC

Civil Action No.

Plaintiffs,
-against-

**ORDER GRANTING
PRO HAC VICE ADMISSION**

Marc Wasserman, David Kane and Selective Financial
Solutions

Defendants.

----- X

This matter, having come before the Court on the application of Romano Law PLLC, attorneys for Dimov Associates LLC d/b/a Dimov Tax and CPA Services and Dimov Wasserman LLC (the “Plaintiffs”) in the above captioned action, for the admission *pro hac vice* of David Fish, Esq. (the “Applicant”), pursuant to L. Civ. R. 101.1(c); and the Court having considered the Declaration of Daniel S. Braverman, Esq. in Support of Admission *Pro Hac Vice*, and the Declaration of David Fish, Esq., which reflects that he satisfies the requirements set forth in L. Civ. R. 101.1(c)(1), and for good cause shown,

IT IS, on this ____ day of May 2025,

ORDERED that the Applicant is hereby granted admission *pro hac vice* to speak for, and participate on behalf of, Plaintiffs in this matter, in the same manner as attorneys authorized to practice law in this State and in this Court; and it is further

ORDERED that all pleadings, briefs, and other papers filed with the Court shall be signed by Daniel S. Braverman, Esq., attorney of record for Plaintiffs or by such other member of the bar of this Court who has or may appear as counsel of record for Plaintiffs, who shall be responsible for the submission of the case and the attorneys admitted hereby; and it is further

ORDERED that the Applicant shall be bound by the Rules of the United States District Court for the District of New Jersey, including all disciplinary rules; and it is further

ORDERED that the Applicant shall respectively pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2(a); and it is further

ORDERED that the Applicant shall respectively pay \$250.00 to the Clerk of the United States District Court for the District of New Jersey for admission *pro hac vice* in accordance with Local Civil Rule 10.1(c)(3); and it is further

ORDERED that the Applicant shall consent to the appointment of the Clerk of the Court as the agent upon whom service of process may be made for all actions against him or his firm that may arise out of his participation in the matter; and it is further

ORDERED that the Applicant shall notify the Court immediately of any matter affecting his standing as a member of the Bar of any court.

United States District Judge